



December 1, 2023

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce

The Honorable Robert C. "Bobby" Scott
Ranking Member
Committee on Education and the Workforce

Dear Chair Foxx and Ranking Member Scott,

On behalf of the nation's community colleges, we write to express our thoughts regarding legislation that would create Workforce Pell Grants. Providing financial support for low-income individuals wishing to participate in these programs to advance their careers is a longstanding top priority for our institutions. As you are aware, community colleges play the primary role in American higher education in providing workers with needed skills at all stages in their careers and educational pathways. Several noteworthy and thoughtful Workforce Pell proposals have been introduced this Congress and we commend you and others for championing this issue.

Republicans and Democrats have long agreed that Workforce Pell is fundamental to an economy that functions at maximum efficiency. Without Workforce Pell, high-quality, skills-based programs remain inaccessible for thousands of students.

The original Workforce Pell legislation, the JOBS Act, was introduced in the 113th Congress and has been reintroduced in every Congress since then. It has garnered wide bipartisan support. We are pleased that the PELL and Jobs to Compete Acts, each of which has positive components, have also been introduced this year. We are further heartened to learn that active negotiations are underway to produce a compromise, bipartisan bill that can pass the House.

We urge Congress to implement a well-run program as soon as possible so that students can gain access to the educational programs that they need, and from which employers subsequently benefit. We have previously provided detailed comments on the legislation and welcome the opportunity to continue working with committee staff as they forge a common approach. Below, we reiterate our overarching principles for Workforce Pell legislation:

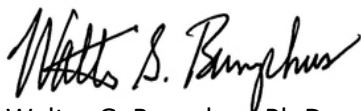
- Workforce Pell policy should reflect the fact that all participating institutions have already undergone the full review necessary to be eligible for Title IV, through accreditation, state licensure, and federal certification. This is the overriding quality control mechanism in federal student aid programs, and it appropriately applies to all programs at all institutions. We accept that more demanding, differential eligibility criteria will be applied to short-term programs. However, a litany of requirements not applied to any other Title IV programs is unnecessary and inappropriate and will undermine the intent of the new eligibility by preventing high-quality programs from becoming eligible. We note that many of the same principles being applied to short-term programs could logically be applied to other Title IV programs.

- Related to the above, all aspects of the short-term eligibility should be made consistent with other Title IV provisions to the maximum extent possible, particularly concerning reporting. Differential reporting requirements could add significantly to program costs without any commensurate benefit. Lengthy lists of program elements to be reported, and in turn disaggregated into many different categories, will produce information of limited value, to the extent it produces information at all, because many programs are small enough that narrow data elements will be suppressed for privacy reasons.
- All Workforce Pell Grant programs will be subject to the gainful employment (GE) statute and regulations. The Administration's GE regulations apply rigorous eligibility criteria that alone should largely allay concerns about program quality, addressing both debt and earnings. Additional "similar but different" standards are not necessary to assess program quality. Given this, any potential new outcomes standards should, wherever possible, strive for alignment with the GE regulations. This will minimize institutional burden and create clear and consistent federal policies in the workforce area. The Title IV statutory and regulatory structure for obtaining earnings and other key information promises to produce data superior to that generated through the WIOA programs.
- The new eligibility should emphasize either outcomes or approval by external bodies, but not both. The JOBS Act contains a reasonable set of approval mechanisms (with the possible exception that programs must be included in the WIOA eligible training provider list) that colleges must meet for programs to qualify. Other legislation seeks to ensure program quality through outcome metrics, such as completion and placement rates. These too can be made workable. However, layering both approaches on top of each other will create unreasonable and unnecessary obstacles for these valuable programs to qualify.

Thank you for considering our views on this matter. We are hopeful that with your leadership Workforce Pell can come to fruition this Congress.

Should you have any questions, please do not hesitate to reach out to us or to our Government Relations team members (David Baime at dbaime@aacc.nche.edu or Carrie Warick-Smith at cwsmith@acct.org).

Sincerely,



Walter G. Bumphus, Ph.D.
AACC President and CEO



Jee Hang Lee
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